



RECEIVED  
FEDERAL  
OPERATIONS CENTER

2003 JAN 29 AM 14

January 25, 2003

Federal Election Commission  
John D. Gibson, Assistant Staff Director  
999 E Street, NW  
Washington, D.C. 20463

Identification Number: C00370783

Reference: Amended October Quarterly Report (8/22/02-9/30/02), received 10/28/02 and  
Amended 12 Day Pre-General Report (10/1/02-10/16/02), received 10/28/02.

Dear Mr. Gibson,

We received your letter requesting more information regarding the above referenced reports. Thank you for the opportunity to respond. Please see below for a detailed account of our actions addressing the items in your letter. If you need more information, please do not hesitate to contact us.

Electronic amendments have been filed for both of the above referenced reports as of 1/18/03. We received your latest letter several days after these filings; essentially they passed each other in the mail. In addition to those amendments, we are sending this response to further clarify our response.

In regards to the October quarterly report, we have addressed the issue of apparent excessive contributions in the appropriate manner. For some, refunds have been issued when we were not able to obtain the redesignation or reattribution permission from the donor within the required 60 days. Others contributions were questioned by your analysts because of the way they were itemized on our report. Changes were made at our analyst's request to show redesignations in the way desired. In some cases, data entry mistakes were made that attributed contributions to the incorrect election period and this made them appear excessive. Changes have been made to these contributions and they are now attributed properly and these changes are reflected on the electronic amendments already filed. Finally, please see the enclosed reattribution and redesignation letters. The remaining contributions in question are addressed by these letters.

We have procedures in place for obtaining reattribution and redesignation letters within the required 60 day limit. Immediately upon receipt of a contribution that temporarily puts a contributor over their election limit a letter is mailed requesting that donor to either redesignate their contribution to another election or to reattribute to their spouse. These letters inform the donor that they can request and receive a refund as well. When these letters are returned, they are reflected in our database to be reported on the subsequent report. If we do not receive permission to reattribute or redesignate within the allotted time period, a refund is issued.